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Attorneys for Defendant Wells Fargo Bank, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANNIE CHANG, TIGER CHANG
INVESTMENTS, LLC, ASIANS
INVESTING IN REAL ESTATE, LLC,
MELANIE GONZALES, GARY
GONZALES, and G&M YOU-NIQUE
PROPERTY LLC, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.,

Defendant.

CASE NO. 4:19-cv-01973-HSG

**STIPULATION AND ORDER TO
EXTEND STAY OF LITIGATION
(as modified)**

1 Defendant Wells Fargo Bank, N.A. (“Defendant”) and Plaintiffs Annie Chang, Tiger Chang
2 Investments, LLC, Asians Investing in Real Estate, LLC, Melanie Gonzales, Gary Gonzales, and
3 G&M You-Nique Property LLC (collectively, “Plaintiffs”), herein referred to collectively as the
4 “Parties,” hereby stipulate pursuant to Civil Local Rule 6-2 and provide good cause as follows:

5 **RECITALS**

6 WHEREAS, on February 3, 2022, the Court entered an Order staying all pending deadlines
7 and hearing dates for ninety (90) days, until May 3, 2022, in anticipation of a settlement and
8 forthcoming motion for preliminary approval (ECF 123);

9 WHEREAS, the Parties have exchanged drafts of the settlement agreement and continue to
10 negotiate terms of settlement;

11 WHEREAS, the Parties agree that additional time will be needed to negotiate settlement
12 terms, finalize the settlement agreement, and draft and file a motion for preliminary approval;

13 WHEREAS, the Court continuing the stay will not prejudice any Party, as all Parties are
14 stipulating to the proposed extension;

15 NOW THEREFORE, undersigned counsel for the Parties, having met and conferred and
16 good cause appearing, hereby stipulate and agree to the extend the stay in this case by forty-five
17 (45) days.

18 **STIPULATION AND [PROPOSED] ORDER**

19 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs
20 and Wells Fargo through their respective undersigned counsel that:

21 1. The stay of litigation will be continued for an additional forty-five (45) days, ending
22 on June 17, 2022;

23 2. This stipulation is without prejudice to the rights, claims, arguments, and defenses of
24 the Parties; and

25 3. All other signatories listed, and on whose behalf the filing is submitted, concur with
26 the content of this stipulation and have authorized the filing.

27 **IT IS SO STIPULATED.**

1
2 DATED: April 29, 2022

MCGUIREWOODS LLP

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Attorneys for Defendant

14 DATED: April 29, 2022

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*Attorneys for Plaintiffs, Individually
and on behalf of all others similarly situated.*

IT IS SO ORDERED. The Court sets a telephonic case management conference at 2:00 p.m. on May 10, 2022. All counsel shall use the following dial-in information to access the call:
Dial-In: 888-808-6929/Passcode: 6064255.

DATED: 5/2/2022



Honorable Haywood S. Gilliam, Jr.
United States District Judge